

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

IN RE:)	
)	
ANDRE GILBERT STOLL)	Case No. 07-13826-SSM
)	Chapter 7
Debtor)	

MOTION FOR TURNOVER

COMES NOW Gordon P. Peyton, the undersigned duly qualified and acting Trustee in Bankruptcy herein, and respectfully moves this Honorable Court to direct the turnover of the remaining \$1,000.00 that the Debtor owes towards payment of his exposed 2007 income tax refunds, and in support thereof states the following:

1. The undersigned is the duly appointed and acting Trustee in this case.
2. The Debtor filed a voluntary Chapter 7 on December 6, 2007. Your undersigned was duly appointed as Trustee in this case on December 7, 2007 and continues to serve as same.
3. The §341 hearing was held on January 14, 2008.
4. Since the Debtor's Homestead Deed was used in its entirety to protect other assets, his 2007 income tax refunds were left exposed to creditors. Your Trustee has allowed the Debtor to make monthly payments towards same until the entire refund was paid over.
5. The last payment received by the Debtor was on February 10, 2009. The Trustee's office granted the Debtor until May 15, 2009 to make the last payment of \$1,000.00. To date, that balance has not been received.

WHEREFORE, the Trustee prays that this Honorable Court enter an Order herein directing the turnover to the Trustee of \$1,000.00 in satisfaction of the amount owed to the estate.

June 5, 2009

/s/ Gordon P. Peyton
Gordon P. Peyton
510 King Street, Suite 301
Alexandria, VA 22314
(703) 684-2000
Trustee in Bankruptcy
Virginia State Bar #5155

CERTIFICATE OF SERVICE

I, Gordon P. Peyton, hereby certify that I have this 5th day of June, 2009, served via either first class mail or ECF, a true copy of the foregoing Motion for Turnover on:

Mark Christian Orndorff, Esquire
6059-C Arlington Blvd.
Falls Church, VA 22044
Counsel for Debtor

Mr. Andre Gilbert Stoll
5623 7th Road South
Arlington, VA 22204
Debtor

Office of the United States Trustee
115 South Union Street, Suite 210
Alexandria, VA 22314

/s/ Gordon P. Peyton
Gordon P. Peyton